

**DIEMER & WEI, LLP**

Kathryn S. Diemer (#133977)  
100 West San Fernando Street, Suite 555  
San Jose, CA 95113  
Telephone: 408-971-6270  
Facsimile: 408-971-6271  
Email: kdiemer@diemerwei.com

-and-

**WILLKIE FARR & GALLAGHER LLP**

Matthew A. Feldman (*pro hac vice*)  
Joseph G. Minias (*pro hac vice*)  
Daniel I. Forman (*pro hac vice*)  
787 Seventh Avenue  
New York, NY 10019-6099  
Telephone: (212) 728-8000  
Facsimile: (212) 728-8111  
Email: mfeldman@willkie.com  
jminias@willkie.com  
dforman@willkie.com

*Counsel for Ad Hoc Group of Subrogation Claim Holders*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**In re:**

**PG&E CORPORATION,**

-and-

**PACIFIC GAS AND ELECTRIC  
COMPANY,**

**Debtors.**

- ☐ Affects PG&E Corporation  
☐ Affects Pacific Gas and Electric Company  
☒ Affects both Debtors

*\* All papers shall be filed in the lead case,  
No. 19-30088 (DM)*

Case No. 19-30088 (DM)  
Chapter 11

(Lead Case)  
(Jointly Administered)

**FIRST AMENDED VERIFIED  
STATEMENT OF THE AD HOC GROUP  
OF SUBROGATION CLAIM HOLDERS  
PURSUANT TO BANKRUPTCY RULE  
2019**

Pursuant to Rule 2019 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), the ad hoc group of subrogation claim holders (“**Ad Hoc Subrogation Group**”), who hold liquidated and unliquidated insurance subrogation claims<sup>1</sup> against PG&E Corporation and Pacific Gas and Electric Company (the “**Debtors**”), relating to certain California wildfires (the “**Wildfires**”) (and other claims as detailed below), by and through its undersigned counsel, hereby submit this first amended verified statement (“**First Amended Verified Statement**”), and in support thereof, state as follows:

1. In or around January 23, 2019, the Ad Hoc Subrogation Group engaged Willkie Farr & Gallagher LLP (“**Willkie**”) to represent it in connection with the Debtors’ restructuring. On March 20, 2019, the Ad Hoc Subrogation Group filed the *Verified Statement of the Ad Hoc Group of Subrogation Claim Holders Pursuant to Bankruptcy Rule 2019* [Dkt. No. 971] (“**Original Verified Statement**”). This First Amended Verified Statement amends and replaces the Original Verified Statement.

2. As of the date of this First Amended Verified Statement, Willkie represents only the Ad Hoc Subrogation Group. Willkie does not represent or purport to represent any other entities in connection with the Debtors’ chapter 11 cases. Each member of the Ad Hoc Subrogation Group is aware of, and has consented to, Willkie’s “group representation” of the Ad Hoc Subrogation Group. No member of the Ad Hoc Subrogation Group represents or purports to represent any other entities in connection with these chapter 11 cases.

3. Attached hereto as **Exhibit A** is a list of the names and addresses of each member of

<sup>1</sup> The term “Subrogation Claims” refers broadly to any claims arising from or related to payments made by an insurer to or on behalf of parties insured under policies issued by such insurer who have or had claims against the Debtors or a Debtor relating to the insured loss on account of which such insurer payments were made (hereinafter, “**Tort Victims**”). The use of the shorthand descriptive term “subrogation” herein is not intended to modify or limit the substantive rights of the holder of these claims or the bases for the claimant’s right to assert claims originating with insured Tort Victims. These “subrogation” claims include, but are not limited to, claims that arise from subrogation (whether such subrogation is contractual, equitable or statutory), assignment (whether such assignment is contractual, equitable or statutory), or otherwise in connection with payments made or to be made by the applicable insurer to insured Tort Victims, and whether arising as a matter of State or federal law, including, without limitation, Section 509 of the Bankruptcy Code. The holder of these claims reserves its rights to assert any and all claims arising from, as a result of, or in connection with payments made or to be made by the claimant (or, where the claimant is the direct or indirect assignee of claims of an insurer, the applicable insurer (the “**Assignor Insurer**”)) to or on behalf of each tort victim insured by the claimant or by the Assignor Insurer, and to assert all such claims both cumulatively and in the alternative.

1 the Ad Hoc Subrogation Group, as well as the amount of each member's disclosable economic  
2 interests (as relayed to Willkie by each Member). The information contained in Exhibit A is based  
3 upon information provided by such members to Willkie and is subject to change.

4 4. The members of the Ad Hoc Subrogation Group either hold disclosable economic  
5 interests, or act as investment advisors or managers to funds and/or accounts or their respective  
6 subsidiaries that hold disclosable economic interests relating to the Debtors. In accordance with  
7 Bankruptcy Rule 2019 and based upon the most recent information provided to Willkie by each  
8 member of the Ad Hoc Subrogation Group, attached hereto as Exhibit A is a list of the names,  
9 addresses and nature and amount of each disclosable economic interest of each present member of  
10 the Ad Hoc Subrogation Group.

11 5. The information set forth in Exhibit A is intended only to comply with Bankruptcy  
12 Rule 2019 and is not intended for any other purpose. Willkie does not make any representation  
13 regarding the validity, amount, allowance, or priority of such economic interests and reserves all  
14 rights with respect thereto.

15 6. Nothing contained in this First Amended Verified Statement (or Exhibit A) should be  
16 construed as a limitation upon, or waiver of, any rights of any member of the Ad Hoc Subrogation  
17 Group to assert, file and/or amend their claims in accordance with applicable law and any orders  
18 entered in these chapter 11 cases.

19 7. Willkie reserves the right to amend and/or supplement this First Amended Verified  
20 Statement in accordance with the requirements set forth in Bankruptcy Rule 2019.

21 Dated: April 17, 2019

22 **WILLKIE FARR & GALLAGHER LLP**

23  
24 /s/ Matthew A. Feldman

25 Matthew A. Feldman (*pro hac vice*)

26 Joseph G. Minias (*pro hac vice*)

27 Daniel I. Forman (*pro hac vice*)

28 *Counsel to Ad Hoc Group of Subrogation Claim Holders*

**Exhibit A**

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

NAME	ADDRESS	WILDFIRE RELATED SUBROGATION CLAIMS <sup>1</sup>	OTHER DISCLOSABLE ECONOMIC INTERESTS
Ace American Insurance Company	c/o Denenberg Tuffley, PLLC 28411 Northwestern Hwy, Suite 600 Southfield, MI 48034	\$12,000,000.00	
Advent Underwriting Ltd.	2 Minster Court Mincing Lane, London EC3R 7BB	\$18,477,227.51	
AIG Europe Limited	c/o Denenberg Tuffley, PLLC 28411 Northwestern Hwy, Suite 600 Southfield, MI 48034	\$112,404.50	
Allstate Insurance Company and certain affiliates	2775 Sanders Road, Suite A2E Northbrook, IL 60062	\$888,656,358.05	37,289 shares of PG&E Corporation Common Stock \$64,285,000.00 in Senior Notes <sup>2</sup> \$3,670,307.98 in other claims
Alternative Insurance Corporation	c/o Denenberg Tuffley, PLLC 28411 Northwestern Hwy, Suite 600 Southfield, MI 48034	\$235,035.80	

<sup>1</sup> Amounts listed herein are on account of claims paid to underlying insured parties affected by various California wildfires. Every member of the Ad Hoc Subrogation Group holds additional claims against the Debtors based on undisclosed internal reserves and future unknown amounts that have neither been paid or reserved for. Certain members' claims are on account of reserves and remain unliquidated as of the date hereof. Those members include: Continental Casualty Company; Endurance American Specialty Insurance Company; Essentia Ins. Co.; First Specialty Insurance Corporation; National Fire & Marine Insurance Company; and RSUI Indemnity Company.

<sup>2</sup> "Senior Notes" shall have the meaning ascribed to it in the *Amended Declaration of Jason P. Wells in Support of First Day Motions and Related Relief* [Dkt. No. 263].

NAME	ADDRESS	WILDFIRE RELATED SUBROGATION CLAIMS <sup>1</sup>	OTHER DISCLOSABLE ECONOMIC INTERESTS
American General Insurance Company DBA ANPAC General Insurance Company	1949 E. Sunshine Springfield, MO 65899	\$4,488,843.76	
Certain affiliates of American International Group, Inc. ("AIG") <sup>3</sup>	175 Water Street New York, NY 10038	\$309,293,740.00	
American Modern Insurance Group	c/o Denenberg Tuffley, PLLC 28411 Northwestern Hwy, Suite 600 Southfield, MI 48034	\$198,558.45	
American National Insurance Company	c/o Denenberg Tuffley, PLLC 28411 Northwestern Hwy, Suite 600 Southfield, MI 48034	\$15,680.88	
Amica Mutual Insurance Company	100 Amica Way Lincoln, RI 02865	\$35,014,454.00	
Arch Specialty Insurance Company	c/o Denenberg Tuffley, PLLC 28411 Northwestern Hwy, Suite 600 Southfield, MI 48034	\$11,240.45	
Armed Forces Insurance Exchange	c/o Denenberg Tuffley, PLLC 28411 Northwestern Hwy, Suite 600 Southfield, MI 48034	\$7,208,701.33	

<sup>3</sup> Members of the Ad Hoc Subrogation Group include: AIG Europe Limited; AIG Property Casualty Company; AIG Specialty Insurance Company; American Home Assurance Company; Granite State Insurance Company; The Insurance Company of the State of Pennsylvania; Lexington Insurance Company; National Union Fire Insurance Company of Pittsburgh, Pa.; and New Hampshire Insurance Company.

NAME	ADDRESS	WILDFIRE RELATED SUBROGATION CLAIMS <sup>1</sup>	OTHER DISCLOSABLE ECONOMIC INTERESTS
Ascot Underwriting Limited	20 Fenchurch Street London, EC3M 3BY	\$2,077,245.00	
Aspen Specialty Insurance Company	c/o Denenberg Tuffley, PLLC 28411 Northwestern Hwy, Suite 600 Southfield, MI 48034	\$1,601,164.38	
The Baupost Group, L.L.C. <sup>4</sup>	10 St. James Avenue Suite 1700 Boston, Massachusetts 02116	\$2,568,661,017.00 <sup>5</sup>	24,500,000 shares of PG&E Corporation Common Stock
Berkley National Insurance Company	222 South 9th Street, Suite 2700 Minneapolis, MN 55402	\$4,876,779.57	
Berkley Regional Insurance Company	222 South 9th Street, Suite 2700 Minneapolis, MN 55402	\$98,440.35	
Berkshire Hathaway Guard Ins.	P.O. Box 1368 Wilkes Barre, PA 18703	\$5,298,837.50	
Berkshire Hathaway Specialty Insurance Company	c/o Denenberg Tuffley, PLLC 28411 Northwestern Hwy, Suite 600 Southfield, MI 48034	\$722,900.00	

<sup>4</sup> Disclosed information reflects funds and investment vehicles controlled by The Baupost Group, L.L.C.

<sup>5</sup> The amounts reflected herein are based on information received from the insurers who were the original holders of these claims and who have made or will make payments to their respective insured policyholders that give rise to, or are otherwise related to, these claims. The Baupost Group L.L.C. has not independently verified such information which remains subject to change based on information subsequently received. The Baupost Group L.L.C. expressly reserves the right to amend or modify the information set forth in this Bankruptcy Rule 2019 Statement, whether based on information that is subsequently received, or for any other reason.



NAME	ADDRESS	WILDFIRE RELATED SUBROGATION CLAIMS <sup>1</sup>	OTHER DISCLOSABLE ECONOMIC INTERESTS
California Casualty Indemnity Exchange	1875 S. Grant Street, Ste. 800 P.O. Box M San Mateo, CA 94402	\$43,856,179.39	
California Mutual Insurance Company	650 San Benito Street Ste. 250 Hollister, CA 95023	\$242,500.00	
Chubb Custom Insurance Company	c/o Denenberg Tuffley, PLLC 28411 Northwestern Hwy, Suite 600 Southfield, MI 48034	\$5,931,468.33	
Chubb Group <sup>6</sup>	436 Walnut Street, 4th Floor Philadelphia, PA 19106	\$437,285,173.62	\$6,505,000.00 in Senior Notes Insurance policies: unliquidated and contingent <sup>7</sup>
Church Mutual Insurance	PO Box 342 Merrill, WI 54452	\$16,745,896.88	
Crestmont Insurance Company	c/o Denenberg Tuffley, PLLC 28411 Northwestern Hwy, Suite 600 Southfield, MI 48034	\$1,000,000.00	
United States Fire Insurance Company d/b/a Crum & Forster	305 Madison Ave. Morristown, NJ 07960	\$1,402,601.19	

<sup>6</sup> Members of the Ad Hoc Subrogation Group include: Bankers Standard Insurance Company; Chubb Custom Insurance Company; Chubb Insurance Company of New Jersey; Chubb National Insurance Company; Federal Insurance Company; Great Northern Insurance Company; Illinois Union Insurance Company; Indemnity Insurance Company of North America; Pacific Indemnity Company; Vigilant Insurance Company; Westchester Fire Insurance Company (Apa); and ACE American Insurance Company (collectively, the “**Chubb Group**”).

<sup>7</sup> Certain Chubb entities are party to various insurance policies and agreements with PG&E and its affiliates.



<b>NAME</b>	<b>ADDRESS</b>	<b>WILDFIRE RELATED SUBROGATION CLAIMS<sup>1</sup></b>	<b>OTHER DISCLOSABLE ECONOMIC INTERESTS</b>
Crusader Insurance Company	26050 Mureau Road Calabasas, CA 91302-3171	\$423,717.00	
Electric Insurance Company	75 Sam Fonzo Drive Beverly, MA 01915	\$7,647,956.61	
Employers Mutual Casualty Company	717 Mulberry Des Moines, IA 50306  P.O. Box 712 Des Moines, IA 50306	\$308,468.00	
Endurance Specialty Insurance Company	c/o Denenberg Tuffley, PLLC 28411 Northwestern Hwy, Suite 600 Southfield, MI 48034	\$16,860.68	
Everest Indemnity Insurance Company	c/o Denenberg Tuffley, PLLC 28411 Northwestern Hwy, Suite 600 Southfield, MI 48034	\$363,185.10	
Everest National Insurance Company	c/o Denenberg Tuffley, PLLC 28411 Northwestern Hwy, Suite 600 Southfield, MI 48034	\$3,000,000.00	
Certain affiliates of Farmers Insurance Exchange	6301 Owensmouth Woodland Hills, CA 91367	\$2,322,288,538.89	
First American Insurance Company	4 First American Way Santa Ana, CA 92707	\$35,511,238.82	

NAME	ADDRESS	WILDFIRE RELATED SUBROGATION CLAIMS <sup>1</sup>	OTHER DISCLOSABLE ECONOMIC INTERESTS
General Security Indemnity Company of Arizona	c/o Denenberg Tuffley, PLLC 28411 Northwestern Hwy, Suite 600 Southfield, MI 48034	\$6,849,746.71	
Generali U.S. Branch	c/o Denenberg Tuffley, PLLC 28411 Northwestern Hwy, Suite 600 Southfield, MI 48034	\$22,480.90	
Global Indemnity Group	3 Bala Plaza East, Suite 300 Bala Cynwyd, PA 19004	\$488,633.65	
Grange Insurance Association	200 Cedar Street Seattle, WA 98121	\$32,399,064.52	
Great American Insurance Company and certain affiliates <sup>8</sup>	Great American Insurance Group P.O. Box 5425 Cincinnati, OH 45201-5425	\$81,098,617.90	
Government Employees Insurance Company and certain affiliates	5260 Western Avenue Chevy Chase, MD 20815	\$11,276,719.68	
The Hanover Insurance Group	440 Lincoln Street Worcester, MA 01653	\$19,196,114.00	

<sup>8</sup> Members of the Ad Hoc Subrogation Group include: Great American Spirit Insurance Company; Great American Assurance Company; Great American Alliance Insurance Company; Great American Insurance Company; Great American Insurance Company of New York; and Great American E&S Insurance Company.

NAME	ADDRESS	WILDFIRE RELATED SUBROGATION CLAIMS <sup>1</sup>	OTHER DISCLOSABLE ECONOMIC INTERESTS
Hartford Accident & Indemnity Company and certain affiliates <sup>9</sup>	1 Hartford Plaza, Hartford, CT 06155	\$274,155,903.43	\$4,549,000 in Senior Notes
HDI Global SE	c/o Denenberg Tuffley, PLLC 28411 Northwestern Hwy, Suite 600 Southfield, MI 48034	\$12,000,000.00	
International Insurance Company of Hannover SE	c/o Denenberg Tuffley, PLLC 28411 Northwestern Hwy, Suite 600 Southfield, MI 48034	\$44,961.80	
Ironshore Insurance Ltd.	c/o Denenberg Tuffley, PLLC 28411 Northwestern Hwy, Suite 600 Southfield, MI 48034	\$713,186.34	
Ironshore Specialty Insurance Company	c/o Denenberg Tuffley, PLLC 28411 Northwestern Hwy, Suite 600 Southfield, MI 48034	\$22, 480.90	
KBIC Insurance Company	55 Challenger Road, Suite 302 Ridgefield Park, NJ 07660	\$1,304,991.34	
Kemper Auto   Alliance United	8260 LBJ Freeway, Suite 400 Dallas, Texas 75243	\$26,348,619.34	

<sup>9</sup> Members of the Ad Hoc Subrogation Group include: Hartford Casualty Insurance Company; Hartford Fire Insurance Company; Hartford Underwriters Insurance Company; Property & Casualty Ins. Company of Hartford; Sentinel Insurance Company Ltd.; Trumbull Insurance Company; and Twin City Fire Insurance Company.

NAME	ADDRESS	WILDFIRE RELATED SUBROGATION CLAIMS <sup>1</sup>	OTHER DISCLOSABLE ECONOMIC INTERESTS
Landmark American Insurance Company	c/o Denenberg Tuffley, PLLC 28411 Northwestern Hwy, Suite 600 Southfield, MI 48034	\$213,186.34	
Certain affiliates of Liberty Mutual Insurance Company ("Liberty")	175 Berkeley Street Boston, MA 02117	\$651,234,287.00	\$122,860,717.00 in surety bonds, unliquidated and contingent <sup>10</sup> Insurance policies: unliquidated and contingent <sup>11</sup>
Liberty Mutual Insurance/Ironshore	175 Powder Forest Drive Weatogue, CT 06089	\$1,385,431.20	
Certain Underwriters of Lloyd's of London, UK Subscribing to Certain Policies <sup>12</sup>	c/o Denenberg Tuffley, PLLC 28411 Northwestern Hwy, Suite 600 Southfield, MI 48034	\$21,325,851.00	
Certain Underwriters at Lloyd's London Subscribing to Policy No. HTB-002381-002 c/o Raphael and Associates	301 Route 17 North, Suite 401 Rutherford, NJ 07070	\$7,456,230.85	
Mapfre USA	11 Gore Road Webster, MA 01570	\$8,747,210.34	4,000 shares of PG&E Corporation Common Stock

<sup>10</sup> Liberty continues to write new bonds in the ordinary course of business post-petition.

<sup>11</sup> Liberty is party to various surety bonds, insurance policies and related agreements with PG&E and its affiliates.

<sup>12</sup> Members of the Ad Hoc Subrogation Group include underwriters to policy numbers: 10492-04, 10942-01, 16463W18, B0507L16360-521, B1230AP56189A17, B128415509W18, B1353DGI700356000, B57635DAAA, H3X000266, H3X000540, H3X000606, H3X000642, H3X000697, H3X000826, H3X000910, LSH100402-05, LSH100966-04, LSH103618-01, NI7NA10020, P17A1770A001, PG1700158, PIV105114, PIV106514, PIV105626, PIV105719, PIV106864, PLNMBLV00001318, PNI1700079, PNI1700089, PNI1700157, PNI1700364, PRPNA1701511, PTNAM1701507, PTNAM1701688, PTNAM1802877, PTNAM1802878, PTNAM1802879, PTNAM1802896, WID52B160101, WIDC80180201, PIV105143, PIV110301, PIV119634, PNI1600673AGA, B1230AP01428A18-16247, PRPNA1701511; and PSLPL106107.

<b>NAME</b>	<b>ADDRESS</b>	<b>WILDFIRE RELATED SUBROGATION CLAIMS<sup>1</sup></b>	<b>OTHER DISCLOSABLE ECONOMIC INTERESTS</b>
Markel Service, Incorporated <sup>13</sup>	4521 Highwoods Parkway Glen Allen, VA 23060	\$26,706,285.00	
Maxum Indemnity Company	c/o Denenberg Tuffley, PLLC 28411 Northwestern Hwy, Suite 600 Southfield, MI 48034	\$106,593.17	
Mercury Insurance and certain affiliates	555 W. Imperial Highway Brea, CA 92821	\$185,140,436.00	
Metropolitan Direct Property & Casualty	500 MetLife Way Freeport, IL 61032	\$6,812,891.97	
Nationwide Mutual Insurance Company and certain affiliates	One Nationwide Plaza, Columbus, Ohio 43215	\$829,383,325.02	
Nautilus Insurance Company	600 Las Colinas Blvd., Ste. 1400 Irving, TX 75039	\$20,896.00	
Nonprofits Insurance Alliance	P.O. Box 8507 Santa Cruz, CA 95061-8507	\$4,258,177.00	
OneBeacon / Atlantic Specialty Ins. Co.	188 Inverness Dr. West, Ste. 600 Englewood, CO 80112	\$384,885.46	
Pacific Specialty Insurance Co.	2200 Geng Road Palo Alto, CA 94303	\$45,259,283.34	

<sup>13</sup> On behalf of its affiliated insurers, Evanston Insurance Company, Markel American Insurance Company, and Markel Insurance Company.

<b>NAME</b>	<b>ADDRESS</b>	<b>WILDFIRE RELATED SUBROGATION CLAIMS<sup>1</sup></b>	<b>OTHER DISCLOSABLE ECONOMIC INTERESTS</b>
Philadelphia Indemnity Insurance Company	One Bala Plaza, Suite 100 Bala Cynwyd, PA 19004	\$22,785,967.27	
The Princeton Excess and Surplus Lines Insurance Company	c/o Denenberg Tuffley, PLLC 28411 Northwestern Hwy, Suite 600 Southfield, MI 48034	\$290,848.35	
ProSight Specialty Insurance	412 Mt. Kemble Avenue Suite 300C Morristown, NJ 07960	\$3,663,638.43	
PURE	44 S. Broadway, Suite 301 White Plains, NY 10601	\$10,545,017.55	
QBE Americas, Inc.	One QBE Way Sun Prairie, WI 53596	\$80,403,727.00	
Rite Aid Corporation and Thrifty Payless, Inc.	c/o Denenberg Tuffley, PLLC 28411 Northwestern Hwy, Suite 600 Southfield, MI 48034	\$2,750,000.00	
Starr Surplus Lines Insurance Company	c/o Denenberg Tuffley, PLLC 28411 Northwestern Hwy, Suite 600 Southfield, MI 48034	\$745,392.18	
Starr Technical Risks	5151 San Felipe Suite #200 Houston, TX 77056	\$241,771.89	
Stillwater Insurance Group	12500 I St., Ste. 100 Omaha, NE 68137	\$8,964,358.14	
Sutter Insurance Company	1301 Redwood Way, Suite 200 Petaluma, CA 94954	\$838,200.00	

NAME	ADDRESS	WILDFIRE RELATED SUBROGATION CLAIMS <sup>1</sup>	OTHER DISCLOSABLE ECONOMIC INTERESTS
Tokio Marine American Insurance Company	c/o Denenberg Tuffley, PLLC 28411 Northwestern Hwy, Suite 600 Southfield, MI 48034	\$14,224.00	
TOPA Insurance Co.	24025 Park Sorrento, Suite 300 Calabasas, CA 91302	\$631,000.00	
The Travelers Indemnity Company and certain of its property casualty insurance affiliates <sup>14</sup>	1 Tower Square, 0000-08MS Hartford, CT 06183	\$664,857,946.00	\$40,000,000.00 in Senior Notes
TWE Insurance Company Pte. Ltd.	c/o Denenberg Tuffley, PLLC 28411 Northwestern Hwy, Suite 600 Southfield, MI 48034	\$3,641,450.00	
United Fire & Casualty Financial Pacific	PO Box 73909 Cedar Rapids, IA 52407	\$4,526,457.00	
Certain affiliates of United Services Automobile Association <sup>15</sup>	9800 Fredericksburg San Antonio, TX 78288	\$532,829,646.00	\$20,000,000.00 in Senior Notes \$38,000 in other claims

<sup>14</sup> Members of the Ad Hoc Subrogation Group include: Travelers Casualty Insurance Company of America; Travelers Indemnity Company of Connecticut; Travelers Property Casualty Company of America; The Travelers Indemnity Company of America; St Paul Fire and Marine, The Travelers Indemnity Company; Travelers Commercial Insurance Company; The Standard Fire Insurance Company; The Travelers Home and Marine Insurance Company; Travelers Property Casualty Insurance Company; Fidelity and Guaranty Insurance Underwriters Inc.; The Northfield Insurance Company; Northland Insurance; Constitution State Services, LLC.

<sup>15</sup> Members of the Ad Hoc Subrogation Group include: United Services Automobile Association; USAA Casualty Insurance Company; USAA General Indemnity Company; Garrison Property and Casualty Company, and affiliates companies.



NAME	ADDRESS	WILDFIRE RELATED SUBROGATION CLAIMS <sup>1</sup>	OTHER DISCLOSABLE ECONOMIC INTERESTS
United Specialty Insurance Company	c/o Denenberg Tuffley, PLLC 28411 Northwestern Hwy, Suite 600 Southfield, MI 48034	\$1,518,656.34	
United States Liability Insurance Company	1190 Devon Park Drive Wayne, PA 19087	\$401,790.00	
Tudor Insurance Company and certain affiliates <sup>16</sup>	300 Kimball Drive, Suite 500 Parsippany NJ 07054	\$3,913,658.23	
Velocity Risk Underwriters, LLC <sup>17</sup>	20 Burton Hills Blvd, Suite 350 Nashville, TN 37215	\$536,123.90	
Wawanesa General Insurance Co.	9050 Friars Rd. San Diego, CA 92108	\$1,926,522.57	
XL America Insurance, Inc.	c/o Denenberg Tuffley, PLLC 28411 Northwestern Hwy, Suite 600 Southfield, MI 48034	\$13,084,303.38	
Zenith Insurance Company	P.O. Box 619083 Roseville, CA 95661-9083	\$3,987,318.25	
Zurich American Insurance Company	1299 Zurich Way Schaumburg, IL 60196	\$43,971,489.13	

<sup>16</sup> Members of the Ad Hoc Subrogation Group include: Western World Insurance Company.

<sup>17</sup> Acting on behalf of on behalf of United Specialty Insurance Company, Interstate Fire and Casualty Company and Certain Underwriters at Lloyd's.